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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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In re:	Bankruptcy No. 18-29247
	(Chapter 13)
NEWLEY BOWDEN WELCH,	
Debtor.	Hon. Joel T. Marker

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**OBJECTION TO CONFIRMATION**

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Gateway One Lending & Finance, LLC (“Gateway”) objects to confirmation of Debtor’s Chapter 13 Plan (the “Plan”) on the following grounds:

1. The amount of Gateway’s secured claim is \$30,932.25 and such claim is not subject to cram down under 11 U.S.C. § 506.
2. The Plan fails to comply with the discount rate requirements of 11 U.S.C. §1325(a)(5).
3. The interests of Gateway in the 2014 Ram 2500 (the “Vehicle”) have not been adequately protected.

4. The Plan fails to comply with the requirements of 11 U.S.C. §1325(a)(5)(B)(iii)(I) in that it fails to provide for equal monthly payments in a sufficient amount for a sufficient term to adequately protect the interests of Gateway in the Vehicle and fully pay the secured claim of Gateway.

5. The proposed monthly payments to Gateway are inadequate.

DATED this 5th day of February, 2019

SNOW, CHRISTENSEN & MARTINEAU

/s/ P. Matthew Cox

P. Matthew Cox

Attorneys for Gateway One Lending & Finance,  
LLC

**CERTIFICATE OF SERVICE BY ELECTRONIC NOTICE (CM/ECF)**

I hereby certify that on February 5, 2019, I electronically filed the foregoing OBJECTION TO CONFIRMATION, with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users.

Lon Jenkins  
Chapter 13 Trustee  
405 South Main Street, Suite 600  
Salt Lake City, UT 84111

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Cottonwood Heights, UT 84121

/s/ P. Matthew Cox \_\_\_\_\_